

By ECF

March 16, 2020

The Honorable Lorna G. Schofield
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Michael T. Zoppo
Principal
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212 641 2268 direct

Re: *Cepeda v. United States et al.*, No. 19 Civ. 5967 (LGS)

Dear Judge Schofield:

In light of the national emergency surrounding COVID-19 and its impact on these proceedings, the parties write to request a 60-day stay.

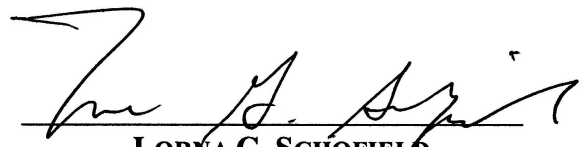
The parties are of the view that current circumstances make completion of fact discovery virtually impossible. As we near the stage of contention disclosures, both parties must rely on the guidance of their respective expert witnesses, practicing medical doctors. However, the parties are finding it challenging to get any time from their respective experts. Moreover, the current demand on the nation's health system is widely-reported, and the parties respectfully submit that they should not add to that demand. As another example, the Government is working toward collecting medical records from various hospitals, but is finding it difficult to complete its document production because resources are (appropriately) directed to treating patients during this emergency.

In the interest of having a complete factual record and avoiding any unnecessary burden upon doctors and hospitals, the parties request a 60-day stay of the proceedings. The parties respectfully suggest that they provide a joint status letter no later than May 15, 2020, setting forth proposed dates for any remaining deadlines, as appropriate.

The parties shall file a proposed Amended Case Management Plan by March 19, 2020 that extends all deadlines sixty days.

SO ORDERED.

Dated: March 17, 2020
New York, New York


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE